

# Review of the Disability Standards for Accessible Public Transport 2002

## SUBMISSION

by

## East Gippsland Transport Working Group

***East Gippsland Representative Contact***

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*Red area indicates Shire of East  
Gippsland, Victoria*

## 1. BACKGROUND

### 1.1 Overview of East Gippsland

This submission must be understood in the context of East Gippsland's demographics and rural environment.

East Gippsland has a large geographic area of 20,931 sq km and a widely dispersed population of 40,037. It has high unemployment, low average income, and rapidly growing aging community.

There is limited public transport infrastructure available in East Gippsland, majority is *inaccessible*: therefore many of our residents are transport disadvantaged.

Transport disadvantage affects the health and well being of our communities and as indicated by the World Health Organisation's *Social Determinants of Health*, a strong link has been made between poorer health and the isolation of people, including a low level of community interaction, having a rather negative impact on the health and wellbeing of our communities.<sup>1</sup>

Those transport disadvantaged include older people, young people, people on low incomes, those living in remote communities, indigenous and people with a disability. Of particular interest to East Gippsland are the aged and remote communities:

#### 1. AGEING POPULATION

East Gippsland faces a rapidly ageing population, estimated population projections in 2021 show that residents over 60 years will comprise just under half the Shire's population

Department of Infrastructure forecasts indicate that across East Gippsland there will be a 90 % increase in the number of people aged 80 years or above between 2001-2021, this increase is 30% more than the estimated increase for Victoria, which is 60%.

#### 2. ACCESSIBILITY / REMOTENESS INDEX FOR AUSTRALIA (ARIA)

The least accessible SLAs (Statistical Local Areas) in Gippsland wide are Orbst and the balance of East Gippsland (not Bairnsdale or the South West), with scores of 4.8 and 3.8 respectively. This indicates they have significantly restricted accessibility of goods, services and opportunities for social interaction.

The remoteness values for localities in the ARIA index are derived from the road distance to service centres. This index does not attempt to measure

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<sup>1</sup> Wilkinson, R. and Marmot, M. (eds.), *The Solid Facts*, World Health Organisation, 1998, p26

isolation using other variables (eg. percentage of population with access to independent transport)

The public transport services that are available in East Gippsland are mainly long haul to Melbourne, Canberra & Bateman's Bay, which is not accessible.

Residents do not have access to public transport at peak times and the limited off peak public transport that is available often does not connect our small townships to our major service centres.

Further to this it was not until 2005 when East Gippsland got it's first low floor accessible public bus.

## 1.2 East Gippsland Transport Working Group

The Rural Access and Transport Project Coordinator from East Gippsland Shire Council facilitated a meeting with the East Gippsland Transport Working Group to obtain a response to the *Issues Paper*, basing the response on case studies.

The Working Group consists of stakeholders who are transport users with a disability and disability service providers from East Gippsland.

<b>Name</b>	<b>Agency</b>
Jodi Moresi	Rural Access Project Officer, East Gippsland Shire
Rhonda James	Transport Project Coordinator, East Gippsland Shire
James Hill	Gippsport Access All Abilities Program
Kathy Reason	Bairnsdale Adult Training Support Service
Cherie Rogers	Orbost Adult Training Support Service
Ann Guy	East Gippsland Arts and Recreation Access Group & Red Cross
Tamara Frew	EGTAFE student with a disability
Sue Watson	Tipping Community Residential Unit
Arthur Beale	Community member with disability
Laura Owens	Community member with disability
Ben Gritt	Community member with disability

## 1.3 Summary position of submission

The working group believes that the *Standards* have had very limited impact on accessibility of public transport in East Gippsland.

## 2 The submission

The submission is structured around questions relevant to the stakeholders as stated in chapter 4 of the *Review of the Disability Standards for Accessible Public Transport 2002 - Issues Paper*.

### 2.1 Achievement of public transport accessibility

#### **2.1.a How has accessibility to conveyances improved (eg, trains, buses, trams, ferries, taxis, aircraft etc changed? Can you provide examples?**

##### **Trains**

Users reported that no changes have been made to Bairnsdale Service since introduction to standards in 2002.

##### **Case Study 1**

###### *Bairnsdale V/Line Service*

*You must book 24hrs ahead of time for a disabled seat. There is only one spot allocated for disabled, and it is in the luggage department, with no rails, no safety straps/clips for wheelchair, no accessible toilet, no access to food cart, no emergency button and no space allocated for carer.*

According to standards at least 25% of compliance should have been made to toilets, allocated space, manoeuvring areas and 100% compliance regarding food and drink services, furniture and fittings, alarms and booked services. NO upgrades have been made to the train carriages in the last 5 years.

Users noted however that changes have been made to Melbourne services since 2002. For example V/Line/Connex Service, Melbourne CBD. Praise was given regarding manoeuvring room, ramps, alarms, doorways and allocated space of this service.

#### **Concerns were raised by the group regarding the equity of service across metro and rural regions.**

##### **Buses**

Users noted limited changes to bus accessibility in East Gippsland. Only one public low ride bus in East Gippsland has been implemented over last 5 years with many local buses able to obtain exemption under Disability Discrimination Act<sup>2</sup>.

Users reported that many disabled groups do not use local buses in East Gippsland due to the following access issues:

- No space allocated for guide dogs in buses
- Limited accessible buses – see above
- Operators not being prepared to assist people with intellectual disabilities

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<sup>2</sup> Low floor bus is owned by Dysons and is used as a public bus town service in Bairnsdale

- Delays
- Poor scheduling time – public transport not operating at peak times
- Unable to use unless 24hr notice given to VLine to arrange hoist

### **Case Study 2**

*Dyson Town Bus – low floor bus*

*Noweyung (ATSS, Bairnsdale) reported that they no longer uses Dyson Town Bus as always late and it is too difficult to support a group of people with ID/Autism for up to 40mins on side of Princess Highway at bus stop. Also bus often takes off too quick, not allowing time for people to sit down. One time a woman fell over in bus and had a seizure because not seated.*

### **Case Study 3**

*Noweyung (ATSS, Orbost) does not use VLine bus as does not operate at peak times nor is a return daily service.*

### **Case Study 4**

*V/Line service Bairnsdale to Lakes Entrance*

*Person with Intellectual Disability had a travel card and had carer notify the bus service prior to boarding the correct drop off point. Person was dropped off at wrong location and was found standing in middle of Highway by police.*

### **Taxis**

Users were generally satisfied with the accessible taxis in Bairnsdale, Lakes Entrance, and Paynesville. All reported that they turned up on time, operators very helpful and disability aware. Users were treated as valued customers. Cabs were sufficient size, though commented that larger ones better.

Note there is no accessible taxi service available in Orbost, East Gippsland's 3<sup>rd</sup> largest service centre.

### **2.1.b Has accessibility to information changed?**

- It is still difficult to obtain timetables from public bus operators who are responsibility for making timetables available<sup>3</sup>. Generally most users need to ring transport operators directly to obtain information about public transport services in East Gippsland.
- Timetables for buses and trains still difficult to read, due to contrast, small font, shiny paper and complexity.
- Timetables have not met 100% compliance as stated in the standards. Suggestions were give for compic, large print, audio.
- The VLine and Metlink website is difficult to access. This was noted both by non-disabled and vision impaired.

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<sup>3</sup> Department of Infrastructure Public Bus Operator Contracts specify it is the responsibility of the operator to provide timetables.

### **2.1.c Has accessibility to infrastructure changed?**

Users commented that there was limited evidence of changes.

#### **Case Study 5**

##### *Infrastructure Issues*

- *Lack of infrastructure to support low ride bus in Bairnsdale, reports of a number of kerbing issues*
- *Taxi bay in Bairnsdale congested with bins, street furniture, on highway, shops - difficult to use*
- *No accessible footpath to bus stops i.e. near hospital Bairnsdale Hospital*
- *No lighting at bus stops eg: Orbost*
- *Issues with crossing Highway and major roads safely to access bus stops or train station – i.e. McCulloch St crossing, if blind, is difficult to cross over Princes Highway to access the hospital*
- *Report that infrastructure upgrade to Bairnsdale train station has led to ease of access, yet not increase use as **train still not accessible!***

The standards are unclear about who is responsible for infrastructure around public transport. Is it the Victorian Dept of Infrastructure, Local Government Areas or other transport providers? This needs to be clarified to ensure action.

### **2.1.d. Are you aware of examples where improved accessibility of public transport has led to increased patronage?**

Overall response from users answered in the negative. Importantly one of main reasons people do not use public transport is because the infrastructure and service is unreliable

#### **Case Study 6**

##### *Unreliable infrastructure or service*

- *A disability passenger from East Gippsland travelling to Melbourne had to wait many hours before the station lift was fixed.*
- *People reported that they do not use the train because if it is delayed (which often occurs on the Eastern Victorian Line), they were not comfortable being stranded somewhere for more than 3 hrs without an accessible toilet.*
- *It was also highlighted that if the train had to change service to a VLine bus, there is no guarantee it is going to be accessible.*

Other reasons people did not use public transport:

- Accessibility on public transport is not consistent on long and short haul trips from East Gippsland to Melbourne. The departure location might be accessible, but arrival location not accessible. This is why 25% compliance measures of the standards needs to be more detailed.
- People too scared to use public transport because of the unknown and feeling vulnerable

### **Case Study 7**

#### *Personal safety concerns on Trains*

*Many people in East Gippsland are choosing to use Red Cross Transport Patient Transport Program to attend medical and specialist appointments as too frightened of public transport. For example a blind man's dog being harassed by group of drunken men on the train, people with Intellectual Disability being teased. Operators unable to do anything until train reach station where police called.*

The standards do not address any of the above issues.

## **2.2 Compatibility of Approach**

### **2.2.a To what extent do the requirements in the Standards address all of the accessibility requirements for people with disabilities? Are there gaps?**

Gaps identified:

- The standards will have little impact on 'fully independent' use of public transport for those requiring physical assistance. Most users reported a need to still have their carer with them when they use public transport.

### **Case Study 8**

*It was reported taxi operators in Orbost were not assisting people to get in and out of taxis unless carer is there at pick up and drop off point<sup>4</sup>.*

It was identified that it needs to be outlined in the *Standards* roles & responsibilities of taxis operators

- The standards are solely around physical access. The *Standards* have limited impact on accessibility for people with Intellectual Disability, mental health or people who use alternative forms of communication, who may require personal/staff assistance - see case study 4.
- The *Standards* do not address access barriers of 'community attitudes'

### **Case Study 9**

*East Gippsland residents with a disability have experienced Melbourne taxi operators refusing to have guide dogs in car and being rushed into buses and trains and trams.*

Majority of feedback from users was that transport operators in the country were much more disability friendly and aware.

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<sup>4</sup> There is no accessible taxi available in Orbost

Ongoing disability awareness training and education about alternative forms of communication for public transport operators is a must. The *Standards* do not address the third objective of the DDA *to promote recognition and acceptance within the community of the principles that persons with a disability have the same fundamental rights as the rest of the community.*

## **2.3 Consistency of Approach**

### **2.3.a Do you consider that the current exemptions granted are appropriate? Should these exemptions be reduced over time?**

The standards exclude 'school buses'. This poses significant issues for people with disabilities in East Gippsland when inaccessible school buses are the main source of transport and are now being used as for public transport solutions under the Transport Connections Project – Let's GET Connected Gippsland East Transport Project.

#### **Case Study 10**

##### *Access to Education*

*There is only one specialist school in East Gippsland and the response was "how do children in outer towns access education?" ATSS service users can use public school buses under the local Transport Connections initiative. Yet if they have access requirements they cannot. As a result parents are transporting their child with a disability up to 100kms a day to get them to ATSS.*

It is too easy for transport services in rural and remote areas to gain 'exemption' under the *Standards*. The reason for which exemption is granted, eg cost, lack of infrastructure, geographic factors and resources available are naturally experienced by rural communities. The question was put forward "who monitors these exemptions?" Furthermore there should be more initiatives for rural providers to purchase accessible conveyances.

### **2.3.b Do you consider that the requirements in the Transport Standards have been applied consistently across different modes of public transport?**

The *Standards* do not ensure the compliance levels across the whole of the state. It is clear that standards have had impact on those services in the metropolitan (Melbourne), yet have had little impact in rural areas. It is not acceptable for state-wide transport providers, eg V/Line, to be deemed as meeting their 25% compliance if that 25% compliance is measured for works only in Melbourne. This needs to be measured around equity across the whole state of Victoria.

The *Standards* are not consistent over different modes of transport, especially buses, which is our main source of public transport in East Gippsland. At

present the *Standards* exclude bus stops. This is a concern when a train service breaks down!<sup>5</sup> How do people with disabilities get to their nearest city, Melbourne?

**2.3.c Are providers meeting their obligations across all aspects of accessibility, which ensures compatibility?**

No

**2.4 Clarification of rights and responsibilities**

**2.4.a Has the introduction of the Transport Standards helped you better understand your rights as a public transport user?**

All but one of the working group were aware of the *Standards*.

The group felt that the *Standards* do not make people more aware of their rights, nor are people aware of complaints processes.

**2.4.b Are there areas of the Transport Standards that you consider unclear in terms of the adjustments operators and providers need to make?**

Everyone felt that the *Standards* were vague and unambiguous - open to interpretation.

It was also raised as a concern and uncertainty as to who monitors the *Standards* or ensures compliance? Are there audits completed on transport providers – especially private operators in rural and remote areas?

**Further Points**

- Passengers have to book at least 24hrs ahead of time to access the VLine bus or train in East Gippsland, even though passengers in wheel chairs using the train still need to sit with the luggage/cargo carriage! Booking this far ahead is difficult if passengers need to get somewhere fast or if medical appointments change.
- Why are manufacturers still manufacturing buses that are not accessible?

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<sup>5</sup> Common on the East Victorian line.